

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)
Plaintiff,)
)
v.) No.: 1:25-CV-XXXXXX-XX
)
U.S. SPRINGFIELD MODEL 1868 STYLE)
TRAPDOOR SADDLE RING CARBINE)
BEARING SERIAL NUMBER 1444,)
Defendant *in Rem.*)

VERIFIED COMPLAINT FOR FORFEITURE *IN REM*

The United States of America, by its attorney, Leah B. Foley, United States Attorney for the District of Massachusetts, in a civil action of forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C), alleges that:

1. This Court has jurisdiction in this matter pursuant to 28 U.S.C. §§ 1345 and 1355.

Venue is appropriate pursuant to 28 U.S.C. § 1395.

2. The Defendant Property consists of the following:

- a. U.S. Springfield Model 1868 Style Trapdoor Saddle Ring Carbine bearing serial number 1444 (the “Defendant Property”).

3. As detailed in the Affidavit of Pasquale Morra, Special Agent with the Federal Bureau of Investigation (“FBI”), attached hereto as Exhibit A and incorporated herein by reference, probable cause exists to believe that the Defendant Property is subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(C), as “any property, real or personal, which constitutes or is derived from proceeds traceable,” to a violation of a “specified unlawful activity.” Specifically, there is probable cause to believe that Defendant Property is property that constitutes or is derived from a violation of 18 U.S.C. § 641 (theft of public property), because Defendant Property was unlawfully removed, by an unknown person, from the Springfield Armory, located in Springfield, Massachusetts, a National Historic site managed by the National Park Service.

WHEREFORE, the United States of America requests:

1. That a Warrant and Monition, in the form submitted herewith, be issued to the United States Marshal for the District of Massachusetts, or his designee, commanding him to seize Defendant Property, and give notice to all interested parties to appear and show cause why the forfeiture should not be decreed;
2. That judgment of forfeiture be decreed against Defendant Property;
2. That, thereafter, Defendant Property be disposed of according to law; and
3. For costs and all other relief to which the United States may be entitled.

Respectfully submitted,

LEAH B. FOLEY
United States Attorney

By: /s/ Carol E. Head
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Dated: April 29, 2025

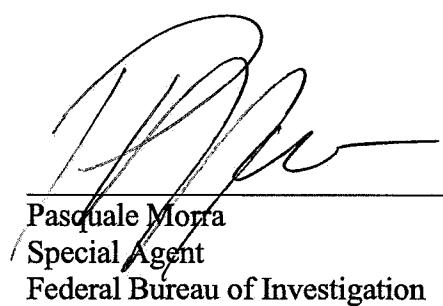
Verification

I, Pasquale Morra, Special Agent with the Federal Bureau of Investigation, hereby verify and declare, under penalty of perjury, that I am a Special Agent with the Federal Bureau of Investigation and, pursuant to 28 U.S.C. § 1746, that I have read the foregoing Verified Complaint for Forfeiture *In Rem* and attached Affidavit and know the contents thereof, and that the matters contained in the Verified Complaint and Affidavit are true to my own knowledge, information, and belief.

The sources of my knowledge and information and the grounds of my belief are the official files and records of the United States, information supplied to me by other law enforcement officers, and my investigation of this case together with other law enforcement officers.

I hereby verify and declare under penalty of perjury that the foregoing is true and correct.

Executed this 28 day of April 2025.



Pasquale Morra
Special Agent
Federal Bureau of Investigation